

Exhibit A

From: Jaspal S. Hare
To: ["Baskin, Stephen"](#)
Cc: [Bryan Haynes](#); [Zhu, John](#); [Kurlancheek, Dara](#)
Subject: RE: Loramax v. Frontier/JetBlue/Porter/WestJet - Extension re 101 MTDs
Date: Wednesday, September 23, 2015 11:11:00 AM

Steve,

Thank you for agreeing not to oppose a 15-day extension. To avoid a dispute here, we'll move only for a 15-day extension at this time.

In order to avoid the need expedited discovery and to meet our deadline, could you please confirm that it is your clients' positions that:

1. your clients do not dispute any fact alleged in the respective first amended complaints;
2. a person of ordinary skill in the art (PHOSITA) of the patent-in-suit would have at least an undergraduate technical degree or equivalent work experience;
3. there are no issues of claim construction for validity;
4. there are no issues of claim construction for infringement;
5. your clients' have waived their right to raise claim constructions issues;
6. the claims of the patent-in-suit cover "the entire field of user-preferred communications";
7. the accused instrumentality for each of your clients' performs "user-preferred communications"; and
8. your clients' have waived their right to contest infringement.

Jaspal S. Hare
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From: Baskin, Stephen [mailto:SBaskin@mayerbrown.com]
Sent: Tuesday, September 22, 2015 8:59 PM
To: Jaspal S. Hare
Cc: Bryan Haynes; Zhu, John; Kurlancheek, Dara
Subject: RE: Loramax v. Frontier/JetBlue/Porter/WestJet - Extension re 101 MTDs

Jaspal –

Thanks for providing the request and the reasoning, which in large part we disagree with. I understand that others have agreed to a 15-day extension, which we will agree to as well.

Best. Steve

From: Jaspal S. Hare [mailto:Jaspal.Hare@solidcounsel.com]
Sent: Tuesday, September 22, 2015 4:37 PM
To: Baskin, Stephen
Cc: Bryan Haynes; Zhu, John; Kurlancheek, Dara
Subject: Loramax v. Frontier/JetBlue/Porter/WestJet - Extension re 101 MTDs

Steve,

Loramax intends to file for a 30-day extension to respond to your client's § 101 MTD. Good cause exists here because, *inter alia*: (1) we need to analyze the large number of § 101 motions filed (about 27), which are very serious in nature, (2) we need to confer with an expert and draft an expert declaration, (3) we intend to move for expedited discovery re § 101 issues (if necessary), (4) we need to draft the about 27 responses, (5) I was on vacation from 9/18-20, and (6) we have also had to expend significant time responding to GEICO's motion to transfer venue.

Let me know if your client opposes.

Thanks in advance!

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